

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY,)	
et al.,)	
Plaintiffs,)	CIVIL ACTION NO: 05-11840-MLW
)	
v.)	
)	
AMERICAN INTERNATIONAL GROUP,)	
and TRENWICK AMERICA)	
REINSURANCE CORPORATION,)	
Defendants.)	

PLAINTIFFS' MOTION FOR ADMISSION *PRO HAC VICE*
OF JOSEPH T. MCCULLOUGH, KATHY L. MCFARLAND AND ROBIN C. DUSEK

Pursuant to Local Rule 83.5.3, Plaintiffs move this Honorable Court to admit Joseph T. McCullough, Esq., Kathy L. McFarland, Esq. and Robin C. Dusek, Esq., *pro hac vice* to represent the Plaintiffs in connection with the above-captioned action. **Defendants have no objection and consent to this motion.** In support of this motion, the Plaintiff states as follows:

1. Counsel for Plaintiff, Steven L. Schreckinger, Lynch Brewer Hoffman & Fink, Boston, Massachusetts, has been admitted to practice before this Court since 1978. At all times Mr. Schreckinger has been a member in good standing of the bar of this Court.
2. As set forth in the Affidavit of Joseph T. McCullough, Esq., attached hereto, Mr. McCullough is a partner of the firm of Lovells, and is a member in good standing of the courts of the State of Illinois. No disciplinary proceedings are pending against Mr. McCullough in any jurisdiction.
3. As set forth in the Affidavit of Kathy L. McFarland, Esq., attached hereto, Ms. McFarland is of counsel of the firm of Lovells, and is a member in good standing in the State of New York and the United States District Court for the Southern District of New York. No disciplinary proceedings are pending against Ms. McFarland in any jurisdiction.

4. As set forth in the Affidavit of Robin C. Dusek, Esq., attached hereto, Ms. Dusek is an associate of the firm of Lovells, and is a member in good standing of the courts of the State of Illinois and the United States District Court for the Northern District of Illinois. No disciplinary proceedings are pending against Ms. Dusek in any jurisdiction.

5. Lovells has been retained by the Plaintiff's to represent them in this action because of their prior attorney-client relationship and the firm's expertise and abilities in this type of litigation. See Affidavit of Mr. McCullough attached hereto.

6. Mr. Schreckinger attests that Mr. McCullough, Ms. McFarland and Ms. Dusek are highly qualified, conscientious counsel of integrity, and are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

7. Either Mr. Schreckinger or another attorney from Lynch Brewer Hoffman & Fink, will be present at all proceedings and sign all pleadings, briefs, and other papers filed with the court and assume full responsibility of the conduct of Mr. McCullough, Ms. McFarland and Ms. Dusek in connection with the above-captioned action.

8. Defendant American International Group, Inc., through its counsel, Morrison Mahoney LLP, has consented to the admission *pro hac vice* of Mr. McCullough, Ms. McFarland and Ms. Dusek in this matter.

9. Defendant Trenwick American Reinsurance Corporation, though its counsel Proskauer Rose LLP, has consented to the admission *pro hac vice* of Mr. McCullough, Ms. McFarland and Ms. Dusek in this matter.

WHEREFORE, the Plaintiff hereby requests that Joseph T. McCullough, Esq., Kathy L. McFarland, Esq. and Robin C. Dusek, Esq. of Lovells, be admitted *pro hac vice* to appear on behalf of Plaintiff and its class of individuals that they seek to represent in this matter.

Dated: Boston, Massachusetts
November 10, 2005

AMERICAN REINSURANCE COMPANY

By: /s/ Steven L. Schreckinger
Steven L. Schreckinger (BBO #447100)
LYNCH BREWER HOFFMAN & FINK
101 Federal Street
Boston, MA 02110
(617) 345-4500

Assented to:

**AMERICAN INTERNATIONAL GROUP, INC. on
behalf of its relevant member and associated
companies,**

By: /s/ John T. Harding
John T. Harding (BBO #221270)
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210
(617) 439-7558

TRENWICK AMERICA REINSURANCE CORP.

By: /s/ Eben A. Krim
Eben A. Krim, Esq.
PROSKAUER ROSE LLP
One International Place, 22nd Floor
Boston, MA 02110
(617) 526-9700

CERTIFICATE OF SERVICE

I, Steven Schreckinger, counsel for Plaintiff, hereby certify that I served the foregoing **PLAINTIFF'S MOTION FOR ADMISSION *PRO HAC VICE* OF JOSEPH T. MCCULLOUGH, KATHY L. MCFARLAND AND ROBIN C. DUSEK**, electronic means on November 10, 2005, on Defendants' counsel John T. Harding, Morrison Mahoney LLP, 260 Summer Street, Boston, Massachusetts and Eben A. Krim, Proskauer Rose LLP, One International Place, 22nd Floor, Boston, Massachusetts 02110.

/s/Steven L. Schreckinger
Steven L. Schreckinger

Dated: November 10, 2005

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY,)
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AMERICAN INTERNATIONAL GROUP,)
and TRENWICK AMERICA)
REINSURANCE CORPORATION,)
Defendants.)

CIVIL ACTION NO: 05-11840-MLW

AFFIDAVIT OF KATHY L. MCFARLAND
IN SUPPORT OF PRO HAC VICE APPLICATION

STATE OF NEW YORK)
COUNTY OF NEW YORK) SS.:
)

KATHY L. MCFARLAND, of full age, being duly sworn according to law, upon her oath deposes and says:

1. I am of counsel of the law firm of Lovells, and maintain an office at 900 Third Avenue, New York, New York 10022. Lovells are the attorneys for the Plaintiffs in this matter. I have personal knowledge of the matter set forth in this Affidavit.

2. Lovells has been retained by the Plaintiffs to represent them in this action. Our prior relationship, expertise and abilities in this type of litigation form the basis for this application for my *pro hac vice* admission to the United States District Court for the District of Massachusetts in this matter.

3. I am presently a member in good standing in every jurisdiction in which I am admitted to practice; Courts of the State of New York (admitted 1995); the United States District Court for the Southern District of New York (admitted 2001).

4. There are currently no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

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5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. I will abide by the local rules of discipline as well as all other rules of legal practice to the best of my ability if I am admitted *pro hac vice* in this matter.

WHEREFORE, I respectfully request that I be admitted *pro hac vice* to represent the plaintiff in this action.

Kathy L. McFarland
Kathy L. McFarland

Sworn and subscribed to before me
this 10th day of November, 2005

Erika Orellana
Notary Public

ERIKA ORELLANA
Notary Public - State of New York
Reg. No. 01098110119
Qualified in Westchester County
Commission Expires May 24, 2008

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE)
COMPANY,)
et al.,)

Plaintiffs,)

v.)

AMERICAN INTERNATIONAL)
GROUP,)

and TRENWICK AMERICA)
REINSURANCE CORPORATION,)

Defendants.)

CIVIL ACTION NO: 05-11840-MLW

AFFIDAVIT OF ROBIN C. DUSEK
IN SUPPORT OF PRO HAC VICE APPLICATION

STATE OF ILLINOIS)
) SS.:
COUNTY OF COOK)

ROBIN C. DUSEK, of full age, being duly sworn according to law, upon her oath
deposes and says:

1. I am an associate in the law firm of Lovells, and maintain an office at 330 N.
Wabash, Chicago, Illinois 60611. Lovells are the attorneys for the Plaintiffs in this matter. I
have personal knowledge of the matter set forth in this Affidavit.

2. Lovells has been retained by the Plaintiffs to represent them in this action. Our
prior relationship, expertise and abilities in this type of litigation form the basis for this
application for my *pro hac vice* admission to the United States District Court for the District
of Massachusetts in this matter.

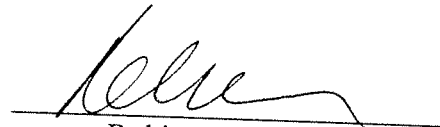
3. I am presently a member in good standing in every jurisdiction in which I am admitted to practice; Courts of the State of Illinois (admitted 1998); the United States District Court for the Northern District of Illinois (admitted 1999).

4. There are currently no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

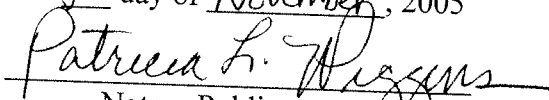
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

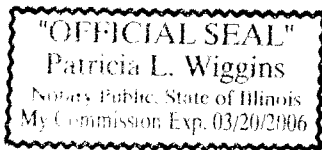
6. I will abide by the local rules of discipline as well as all other rules of legal practice to the best of my ability if I am admitted *pro hac vice* in this matter.

WHEREFORE, I respectfully request that I be admitted *pro hac vice* to represent the plaintiff in this action.


Robin C. Dusek

Sworn and subscribed to before me
this 8th day of November, 2005


Notary Public



UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE
COMPANY,
et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL
GROUP,
and TRENWICK AMERICA
REINSURANCE CORPORATION,
Defendants.

CIVIL ACTION NO: 05-11840-MLW

**AFFIDAVIT OF JOSEPH T. MCCULLOUGH
IN SUPPORT OF PRO HAC VICE APPLICATION**

STATE OF ILLINOIS)
) SS.:
COUNTY OF COOK)

JOSEPH T. MCCULLOUGH, of full age, being duly sworn according to law, upon his oath deposes and says:

1. I am a partner in the law firm of Lovells, and maintain an office at 330 N. Wabash, Chicago, Illinois 60611. Lovells are the attorneys for the plaintiff, individually and as representatives of a putative class of stockholders in this matter. I have personal knowledge of the matter set forth in this Affidavit.

2. Lovells has been retained by the plaintiff to represent it in this action. Our prior relationship, expertise and abilities in this type of litigation form the basis for this application for my *pro hac vice* admission to the United States District Court for the District of Massachusetts in this matter.

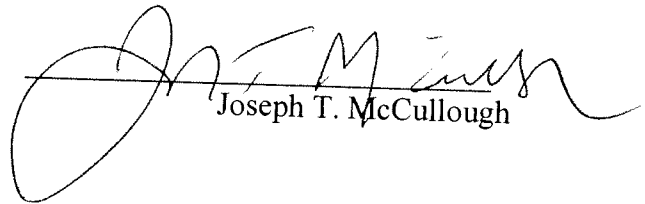
3. I am presently a member in good standing in every jurisdiction in which I am admitted to practice; Courts of the State of Illinois (admitted 1985).

4. There are currently no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

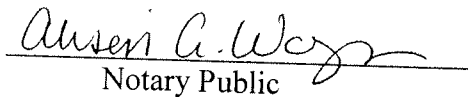
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. I will abide by the local rules of discipline as well as all other rules of legal practice to the best of my ability if I am admitted *pro hac vice* in this matter.

WHEREFORE, I respectfully request that I be admitted *pro hac vice* to represent the plaintiff in this action.


Joseph T. McCullough

Sworn and subscribed to before me
this 8th day of November, 2005


Notary Public

